

Message

From: Mednick, Richard [Mednick.Richard@epa.gov]
Sent: 12/10/2019 12:19:16 AM
To: Cora, Lori [Cora.Lori@epa.gov]
CC: Allen, Elizabeth [allen.elizabeth@epa.gov]
Subject: RE: Oregon Risk Rules

Great, I will check the citations, thanks, Lori. Richard

From: Cora, Lori <Cora.Lori@epa.gov>
Sent: Monday, December 9, 2019 12:20 PM
To: Mednick, Richard <Mednick.Richard@epa.gov>; Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Oregon Risk Rules

Richard, the Oregon regs are very diffuse and all over the place. I recall there is a place that makes it clear that those cancer risk levels are cleanup standards. That's why looking at our ARAR table would confirm what regulatory citations get you there.

Lori Houck Cora | Assistant Regional Counsel
U.S. Environmental Protection Agency | Region 10
P: (206) 553.1115 | F: (206) 553.1762 | cora.lori@epa.gov

Follow @EPAnorthwest on Twitter! <https://twitter.com/EPAnorthwest>

From: Mednick, Richard <Mednick.Richard@epa.gov>
Sent: Monday, December 09, 2019 11:36 AM
To: Cora, Lori <Cora.Lori@epa.gov>; Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: Oregon Risk Rules

Lori and Elizabeth,

For the Bradford Island Site (which may be proposed for the NPL), the Army Corps of Engineers believes that Oregon risk assessment rules (OAR 340-122-0084 & 340-122-0115) would not be ARARs because the rules do not contain cleanup standards and do not address a particular contaminant, action or location. Those rules prescribe an acceptable risk level of 1×10^{-6} for individual carcinogens and 1×10^{-5} for multiple carcinogens. The Oregon rules look pretty similar to MTCA which I think we have always treated as ARARs for Washington sites. Do you know whether we have considered these Oregon rules ARARs for Oregon sites?

Thank you,

Richard

Richard Mednick
Associate Regional Counsel
Regional Judicial Officer
U.S. EPA | Region 10
1200 Sixth Avenue
Suite 155, M/S 11 C07
Seattle, WA 98101
(206) 553-1797

